



MITCHELL SEGAL & WAHN, LLP  
APPLICATION GRANTED  
SO ORDERED  
VERNON S. BRODERICK  
U.S.D.J. 8/29/23

Via ECF Filing  
Honorable Vernon Broderick  
United States District Court  
Southern District Of New York  
500 Pearl Street  
New York, New York 10007

August 28, 2023

Re: Swartz v. Giraffe Company, Inc., et. al.  
Case No.: 1:23-cv-03842-VSB

Dear Magistrate Judge Vernon Broderick:

I represent Defendant Giraffe Company Inc. and Library Hotel Company Inc. in the above entitled action and cordially request that the Certificate of Default be withdrawn and an extension of time to file a response to the Plaintiff's Complaint by August 29, 2023. I have contacted Plaintiff's counsel who has consented to this withdrawal. Attached please find a Stipulation extending the Defendant's time to respond to the Plaintiffs' Complaint by tomorrow, August 29, 2023. I respectfully request the Court to grant this request.

This is the first extension request in this matter. I thank your honor for the time taken to review this request.

Respectfully submitted,

/s/ Mitchell Segal

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Mitchell Segal

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